

FILED

OCT 15 2018

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

CAROLITA REEDER SHINN, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA.
BY KMT DEPUTY

MARK ALLEN PETERS,,)

Petitioner,)

v.)

OKLAHOMA DEPARTMENT OF)

CORRECTIONS, et al.,)

Defendants)

CASE NO: CIV-18-0144-G

MOTION FOR SUMMARY JUDGMENT BY DEFAULT

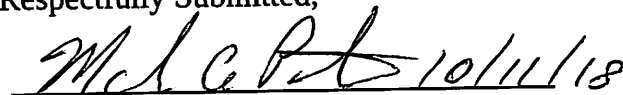
Petitioner, COMES NOW filing PRO-SE asks this Honorable court to award summary judgment due to Defendants Correct Care Solutions LLC, (Corporate Creations Network Inc.) (hereinafter known as Defendant) failure to submit their special report in the allotted time frame.

1. The Defendant was served with a copy of the summons and complaint and the order from the court to provide a special report as it appears from the proof of service on file. Ms. Erika Cotton did sign for and accept the summons and complaint and the order at the address that was provided to the Petitioner. If Ms Cotton was not a registered agent then why did she not send the U.S. Marshal to the correct address as did the GEO group when they were served at the wrong address that was given to the Petitioner. Austin Young OBA # 32684 must have been given a copy of the complaint for Mr. Young to file Defendants motion to dismiss and to file a motion to dismiss for Ms Tocknell, Ms. Holmburg and Ms. Savoy that was filed on 8/27/18 CV-2017-658-M which should have been filed under same case # CIV-18-0144-G.
2. The Defendant's Attorney of record Austin J. Young OBA #32684 has not filed their special report and is trying to say that Petitioner has served the wrong party but Petitioner was not provided with the proper address in the proper time frame, [A]nd Ms. Cotton who is employed by Correct Care Solutions did sign for and accept the summons and the complaint on 7/12/18 according to the process receipt from the U.S. Marshals Office, therefore Petitioner should be granted summarily judgment by default
3. Medical has falsified Medical records stating Petitioner is getting treatment for His back, but they have done nothing but, an X-ray and to give Him Flexeril and Tylenol 3s. Petitioner has been waiting months for an MRI and to be seen by a specialist.
4. Petitioner has to file RTS and/or Grievances to get His Medication, and proper Medical care, (on grievance # 18-166, my relief was granted, and G.E.O finally changed their pill-call policy and stated " Mr. Peters WE will no longer float pills at this facility" due to this medical staff giving the wrong medications to inmates.)

(->)
BACK

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the forgoing is true and correct.

Respectfully Submitted,

10/11/18

Mark Allen Peters
L.C.F. #580565 / 3-D-106
8607 SE Flower Mound Rd
Lawton, OK 73501

CERTIFICATE OF MAILING

THIS IS TO CERTIFY THAT ON THE 11th DAY OF October, 2018 I MAILED A TRUE AND CORRECT COPY OF THE FOREGOING APPLICATION TO :

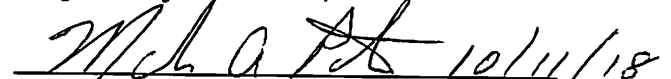
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Respectfully Submitted,


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